

JONATHON N. AMLUNG
ATTORNEY AT LAW
1000 REPUBLIC BUILDING
429 W. MUHAMMAD ALI BLVD.
LOUISVILLE, KENTUCKY 40202-2347

J.D./M.B.A.
LICENSED IN KENTUCKY, OHIO AND COLORADO

TELEPHONE: (502) 587-6838
FACSIMILE: (502) 584-0439
E-MAIL: jonathon@amlung.com

November 7, 2003

Mr. Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602

RE: SouthEast Telephone, Inc. v. BellSouth Telecommunications, Inc.,
Case Number 2003-00105

Dear Mr. Dorman:

Please find enclosed for filing an original and ten (10) copies of SouthEast Telephone's First Set of Data Requests to BellSouth Telecommunications, Inc., for filing in the above-referenced case.

Thank you for your attention to this matter. Please do not hesitate to contact me should you have any questions or concerns.

Cordially yours,


Jonathon N. Amlung

Enclosures

cc: Parties of record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

SOUTHEAST TELEPHONE, INC.

COMPLAINANT

vs

BELLSOUTH TELECOMMUNICATIONS

DEFENDANT

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CASE NO. 2003-00105

SOUTHEAST TELEPHONE, INC.'S FIRST SET OF DATA REQUESTS
TO BELLSOUTH TELECOMMUNICATIONS, INC.

Pursuant to 807 KAR 5:001, SouthEast Telephone, Inc. ("SET") requests that BellSouth Telecommunications, Inc. ("BellSouth") file the original and five (5) copies of the following information with the Commission within thirty (30) days of the date of this request, with a copy to all parties of record.

1. Is it BellSouth's assertion that the Federal Communications Commission's ("FCC") order in CC Docket No. 99-200 concerning Numbering Resource Optimization required BellSouth to implement an 11-digit dialing plan instead of a 10-digit dialing plan? If the answer is in the affirmative, please explain in detail why an 11-digit dialing was required instead of a 10-digit dialing plan.

RESPONSE:

2. In complying with the FCC's order in CC Docket No. 99-200, what necessitated the change to the current 11-digit dialing plan, BellSouth's routing infrastructure or the billing system? Explain.

RESPONSE:

3. Prior to the adoption of the 11-digit dialing plan, did BellSouth ever use a 10-digit dialing plan? If so, please state the following,

- (a) The dates on which ten-digit dialing was utilized;
- (b) The geographic areas where ten-digit dialing was utilized;
- (c) The reasons that 10-digit dialing is no longer being used with explanation as to why it is no longer being used. In your explanation, please describe the problem in complete detail, and explain whether it was billing-related, routing-related or due to customer confusion.

RESPONSE:

4. Were other dialing plans considered or tested before the 11-digit dialing plan was adopted? If the answer is in the affirmative, please describe in complete detail:

- (a) What plan(s) were tested?
- (b) When was the plan(s) tested?
- (c) What was the result of the testing?

RESPONSE:

5. In response to the Commission's Item No. 5(a), could BellSouth not have adapted their optional Land-to-Mobile Service to work within the wireless number pooling and porting environment instead of eliminating local dialing patterns (7 or 10-digit) for all intraLATA toll calls originating from BellSouth served within the LATA? Why or why not?

RESPONSE:

6. In regard to the Commissions Item (5), BellSouth's answer to 5(c) addressing customer confusion,

(a) did BellSouth take any preventive steps to make the general public aware that numbers that had previously been toll-free were now going to be billed? If so, please describe in detail each step taken, including the persons and/or entities were notified, the timing of the notifications, and the content and method of each such notification.

(b) did BellSouth notify institutions such as hospitals, schools, and prisons that use PBX systems? If so, please identify which institutions were notified, including in your answer the timing, content and method of such notification.

RESPONSE:

7. Were new billing systems considered or tested before the 11-digit dialing plan was adopted? ? If so, please describe in complete detail those systems that were considered or tested, including in your answer an explanation as to why they were not adopted.

RESPONSE:

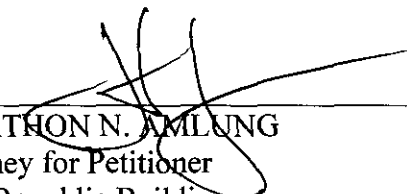
8. Is the primary purpose of 11-digit dialing in the BellSouth's Optional (LTM) Service to ensure that the billing system will render a correct bill to customers other their own? Please explain.

RESPONSE:

9. Is BellSouth aware that ALLTEL currently allows 10-digit dialing?

RESPONSE:

Respectfully submitted,



JONATHON N. AMLUNG
Attorney for Petitioner
1000 Republic Building
429 W. Muhammad Ali Blvd.
Louisville, KY 40202
(502) 587-6838

CERTIFICATION

I hereby certify that a true and correct copy of the foregoing was mailed, this the 7th day of November, 2003, to:

Dorothy J. Chambers
BellSouth Telecommunications, Inc.
601 W. Chestnut Street, Room 407
P.O. Box 32410
Louisville, KY 40232



JONATHON N. AMLUNG